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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

YAMIL ANDRES BELAHONIA
LANATTA,

Defendant.

Case No. 2:17-cr-00218-APG-PAL

STIPULATION FOR PROTECTIVE
ORDER

IT IS HEREBY STIPULATED AND AGREED between the parties, STEVEN W. MYHRE, Acting United States Attorney for the District of Nevada, and Frank Johan Coumou, Assistant United States Attorney, counsel for the United States, Assistant Federal Public Defender Rebecca Levy, Esq., counsel for the defendant YAMIL ANDRES BELAHONIA LANATTA, that this Court issue an Order protecting from disclosure to the public any discovery documents, recordings, and photographs containing the personal identifying information such as social security numbers, drivers' license numbers, dates of birth, or addresses, of participants, witnesses

1 and victims in this case. Such documents shall be referred to hereinafter as “Protected
2 Documents.” The parties state as follows:

3 1. Protected Documents which will be used by the government in its case in chief
4 include personal identifiers, including social security numbers, drivers’ license numbers, dates of
5 birth, and addresses, of participants, witnesses, and victims in this case.

6 2. Discovery in this case is estimated to be more than five hundred pages in length
7 plus recordings. Given the nature of the allegations and the facts and circumstances surrounding
8 the crimes with which the defendant is charged, multiple identifiers on documents, recordings, and
9 photographs contain the name of participants, witnesses, and the victim. Redacting the personal
10 identifiers of participants, witnesses, and victim would prevent the timely disclosure of discovery
11 to defendant.

12 3. The United States agrees to provide Protected Documents without redacting the
13 personal identifiers of participants, witnesses, and victim.

14 4. Access to Protected Documents will be restricted to persons authorized by the
15 Court, namely defendant, his attorney of record and attorneys’ paralegals, investigators, experts,
16 and secretaries employed by the attorney of record and performing on behalf of defendant.

17 5. The following restrictions will be placed on defendant, defendant’s attorney and
18 the above-designated individuals unless and until further ordered by the Court. Defendant,
19 defendant’s attorney and the above-designated individuals shall not:

20 a. make copies for, or allow copies of any kind to be made by any other person of
21 Protected Documents;

22 b. allow any other person to read Protected Documents, recordings, and photographs;
23 and
24

1 c. use Protected Documents, recordings, and photographs for any other purpose other
2 than preparing to defend against the charges in the Indictment or any further superseding
3 indictment arising out of this case.

4 6. Defendant's attorney shall inform any person to whom disclosure may be made
5 pursuant to this order of the existence and terms of this Court's order.

6 7. The requested restrictions shall not restrict the use or introduction as evidence of
7 discovery documents containing personal identifying information such as social security numbers,
8 drivers' license numbers, dates of birth, and addresses during the trial of this matter.

9 8. Upon conclusion of this action, defendant's attorneys shall maintain said files
10 and/or dispose of said files according to established record keeping policy adopted by the Federal
11 Public Defender's Office—District of Nevada.

12
13 Steven W. Myhre
Acting United States Attorney

14 /s/Frank Johan Coumou
15 Frank Johan Coumou
16 Assistant United States Attorney


August 28, 2017
DATE

17 /s/Rebecca Levy, Esq.
18 Rebecca Levy, ESQ.
19 Counsel for defendant YAMIL ANDRES BELAHONIA LANATTA

August 28, 2017
DATE

20 **ORDER**

21 IT IS SO ORDERED this 8th day of September, 2017.

22 
UNITED STATES DISTRICT/MAGISTRATE COURT JUDGE